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6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

8 * * *

9 UNITED STATES OF AMERICA,) **2:15-mj-00008-CWH**
10)
11 Plaintiff,)
12 vs.)
13 ERNESTO JOSHUA RAMOS,)
14)
15 Defendant.)
16 _____)

17 **STIPULATION TO CONTINUE PRELIMINARY HEARING**

18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
19 United States Attorney, and Nicholas D. Dickinson Assistant United States Attorney, counsel for
20 the United States of America, and Gabriel Grasso, counsel for Defendant RAMOS, that the
21 preliminary hearing for the above-captioned matter, currently scheduled for August 10, 2015, at
22 the hour of 4:00 p.m., be vacated and continued to a date and time convenient for this Court, but
23 in no event earlier than 30 days.

24 This stipulation is entered for the following reasons:

25 1. On June 1, 2015, defendant retained his current counsel Gabriel Grasso. On June
26 2, 2015, government counsel was informed that defendant retained new counsel.
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1 2. Since the last continuance, defendant's counsel met with the government in an
2 attempt to resolve the case. In addition, Defendant counsel's has met with the defendant several
3 times regarding the case.

4 3. The parties need an additional short continuance to determine if the case can be
5 resolved pre-indictment.

6 2. Defendant is not in custody and does not object to the continuance.

7 3. Denial of this request for continuance of the preliminary hearing would prejudice
8 both the defendant and the government and unnecessarily consume this Court's valuable
9 resources, taking into account the exercise of due diligence.

10 4. Additionally, denial of this request for continuance could result in a miscarriage
11 of justice.

12 5. The additional time requested by this stipulation, is excludable in computing the
13 time within which the defendant must be indicted and the trial herein must commence pursuant
14 to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(8)(A), considering the factors under
15 18 U.S.C. § 3161(h)(8)(B)(i) and (iv).

16 6. This is the seventh request for a continuance of the preliminary hearing herein.
17 The parties do not anticipate any additional continuances.

19 DATED: June 26, 2015.

21 _____
22 /s/
23 NICHOLAS D. DICKINSON
24 Assistant United States Attorneys
25 Counsel for the United States

21 _____
22 /s/
23 GABREIL GRASSO
24 Counsel for Defendant RAMOS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,) 2:15-mj-00008-CWH
)
)
Plaintiff,) ORDER CONTINUING
)
)
vs.)
)
ERNESTO JOSHUA RAMOS,) PRELIMINARY HEARING
)
)
Defendant.)
)

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, **IT IS
HEREBY ORDERED**, that the preliminary hearing in the above-captioned matter, currently
scheduled for July 1, 2015, at the hour of 4:00 p.m., be vacated and continued to
September 24 , 2015 at the hour of 4:00 p.m.

UNITED STATES MAGISTRATE JUDGE